

**UNSEALED**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**UNSEALED**

Holding a Criminal Term

Grand Jury Sworn in on January 16, 1991

UNITED STATES OF AMERICA	:	CRIMINAL NO. 91- 0504
v.	:	Grand Jury Original
JOHN DOE,	:	VIOLETIONS: 18 U.S.C. § 371
also known as AHMAD SOBHI,	:	(Conspiracy to Commit Offenses
also known as TAYSEER,	:	Against the United States);
WADOUD MUHAMMAD HAFIZ AL-TURK,	:	18 U.S.C. § 2331(b)(2)
also known as WADOUD	:	(Conspiracy to Murder United
MUHAMMAD FAHD AL-TURK,	:	States Nationals Outside the
also known as SALMAN ALI	:	United States);
EL-TURKI,	:	18 U.S.C. § 2331(a)(1) (Murder
also known as SLIMAN ALI	:	of United States Nationals
EL-TURKI,	:	Outside the United States);
also known as BOU BAKER	:	18 U.S.C. § 2331(b)(1)
MUHAMMAD,	:	(Attempted Murder of United
ZAYD HASSAN ABD AL-LATIF MASUD	:	States Nationals Outside the
AL SAFARINI,	:	United States);
also known as MUSTAFA HASSAN	:	18 U.S.C. § 2331(c)(2)
SAID BOMER,	:	(Causing Serious Bodily Injury
also known as MUSTAFA,	:	to United States Nationals
JAMAL SAEED ABDUL RAHIM,	:	Outside the United States);
also known as FAHAD ALI AL-	:	18 U.S.C. § 1203 (Hostage
JASEEN,	:	Taking);
also known as FAHD ALI	:	18 U.S.C. § 924(c) (Use of a
AL-JASSEM,	:	Firearm During a Crime of
also known as FAHAD,	:	Violence);
also known as ISMAEL,	:	18 U.S.C. § 32(a)(1) (Damaging
MUHAMMAD ABDULLAH KHALIL	:	an Aircraft);
HUSSAIN AR-RAHAYYAL,	:	18 U.S.C. § 32(a)(2)
also known as KHALIL ANTWAN	:	(Placing Destructive Devices
KIWAN,	:	on an Aircraft);
also known as KHALIL,	:	18 U.S.C. § 32(a)(5)
also known as WALID,	:	(Performing an Act of Violence
MUHAMMAD AHMED AL-MUNAWAR,	:	Against an Individual on an
also known as MANSOOR	:	Aircraft);
AL-RASHID,	:	49 U.S.C. App. § 1472(i)
also known as MANSOUR ABDUL	:	(Aircraft Piracy);
RAHMAN RASHED,	:	18 U.S.C. § 844(i) (Malicious
also known as MANSOOR,	:	Damage to an Aircraft);
also known as ASHRAF NAEEM,	:	18 U.S.C. § 2 (Aiding and
	:	Abetting)
Defendants.	:	

SPORKIN, J.

**B**

**FILED IN OPEN COURT**

AUG 29 1991

CLERK, U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA

INDICTMENT

The Grand Jury charges:

COUNT ONE

INTRODUCTION

At all times relevant to this indictment:

1. The Abu Nidal Organization was a terrorist group whose objective was to promote the Palestinian cause by coercing and intimidating through force and violence, by causing personal injury to civilians, and by causing economic damage to American and Israeli interests around the world.

2. The Abu Nidal Organization maintained offices in Damascus, Syria and Tripoli, Libya.

3. Defendant JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, was the head of the Abu Nidal Organization's External Affairs Committee, also known as the External Information Committee.

4. Defendant WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, was a member of the Abu Nidal Organization's Foreign Affairs Committee.

5. Defendants ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL,

MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, were members of the Abu Nidal Organization.

6. Pan American World Airways was an airline owned by a corporation created under the laws of a State of the United States and registered under Chapter 20, Title 49 of the United States Code, which airline flew its aircraft in commerce between the United States and other countries. Pan American World Airways operated aircraft leased from and owned by Bankers Trust Company, a corporation created under the laws of the State of New York.

7. Pan American World Airways' aircraft bearing United States registration number N656PA was a civil aircraft as defined in Section 1301 of Title 49 of the United States Code Appendix.

8. On September 5, 1986, Pan American World Airways flight 73 (United States aircraft registration number N656PA) was scheduled to fly from Karachi, Pakistan to Frankfurt, West Germany.

#### THE CONSPIRACY

9. From on or about early July 1986 to on or about September 5, 1986, within the countries of Lebanon, Libya, Syria, Pakistan, and elsewhere outside the United States, defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER

MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, together with others known and unknown to the Grand Jury, co-conspirators but not defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate and agree to commit offenses against the United States, that is:

a. to commit murder with premeditation and malice aforethought, in violation of 18 U.S.C. §§ 2331(a)(1) and 2;

b. to use and carry firearms and destructive devices during and in relation to crimes of violence, in violation of 18 U.S.C. §§ 924(c) and 2;

c. to attempt to commit murder with premeditation and malice aforethought, in violation of 18 U.S.C. § 2331(b)(1);

d. to engage in acts of physical violence which would cause serious bodily injury to United States nationals, in violation of 18 U.S.C. §§ 2331(c)(2) and 2;

e. to seize and detain, and threaten to kill, injure and continue to detain passengers and crew, including nationals of the United States, on Pan American World Airways flight 73, in order to compel Karachi Airport authorities to provide a cockpit crew to

fly the aircraft to Larnaca, Cyprus and to Israel, to compel authorities in Cyprus to release Palestinian prisoners being detained in Cyprus, and to compel the government of Israel to release Palestinian prisoners being detained in Israel, as a condition for the release of passengers on flight 73, in violation of 18 U.S.C. §§ 1203 and 2.

f. to damage, destroy and disable and cause to be damaged, destroyed and disabled civil aircraft United States registration number N656PA of Pan American World Airways, an aircraft in the special aircraft jurisdiction of the United States and which was used, operated and employed in interstate and foreign air commerce, in violation of 18 U.S.C. §§ 32(a)(1) and 2.

g. to place and cause to be placed a destructive device and substance in, upon and in proximity to Pan American World Airways flight 73, in a manner likely to endanger the safety of civil aircraft number N656PA of Pan American World Airways, an aircraft in the special aircraft jurisdiction of the United States and which was used, operated and employed in interstate and foreign air commerce, in violation of 18 U.S.C. §§ 32(a)(2) and 2.

h. to perform and cause to be performed acts of violence against various individuals, that is, assault members of the crew and passengers on board Pan American World Airways flight 73 in a manner likely to endanger the safety of civil aircraft United States registration number N656PA of Pan American World Airways, an aircraft in the special aircraft jurisdiction of the United States and which was used, operated and employed in interstate and

foreign air commerce, in violation of 18 U.S.C. §§ 32(a)(5) and 2.

i. to seize and exercise control over an aircraft and attempt to seize and exercise control over an aircraft within the special aircraft jurisdiction of the United States, that is, Pan American World Airways flight 73 (United States registration number N656PA), by force and violence and threat of force and violence and by other forms of intimidation, with wrongful intent, that is, armed with AK47 assault rifles, pistols, hand grenades and plastic explosives, in violation of 49 U.S.C. App. § 1472(i) and 18 U.S.C. § 2.

j. to maliciously damage and destroy and attempt to damage and destroy by means of an explosive a vehicle used in interstate and foreign commerce, that is, civil aircraft United States registration number N656PA of Pan American World Airways, causing death and injury to persons as a direct and proximate result of such conduct, in violation of 18 U.S.C. §§ 844(i) and 2.

MEANS AND METHODS USED BY THE CONSPIRATORS  
TO FURTHER THE OBJECT OF THE CONSPIRACY

11. Among the means used by the conspirators to further the object of the conspiracy were the following:

a. to effectuate the conspiracy, the conspirators agreed to hijack an aircraft operated by an American airline, hold the passengers and crew as hostages, fly the aircraft to Larnaca, Cyprus and to Israel, compel authorities in Cyprus to release Palestinian prisoners being detained in Cyprus, compel the government of Israel to release Palestinian prisoners being detained in Israel, and destroy the aircraft and its occupants by means of explosive devices.

b. to effectuate the conspiracy, six of the conspirators undertook preparations in Pakistan to hijack an aircraft operated by Pan American World Airways, an American corporation.

c. to ensure that no one could thwart the hijacking, four of the conspirators boarded Pan American World Airways flight 73 suddenly and without warning;

d. to force the crew and passengers of Pan American World Airways flight 73 to obey their demands, four of the conspirators armed themselves with various types of weapons and explosive devices.

e. to maintain control over and to terrorize the crew and passengers so that no one would attempt to interfere with the seizure of the aircraft and the carrying out of the conspiracy, the conspirators discharged their firearms and assaulted the crew upon boarding the aircraft.

f. to coerce and pressure the Karachi Airport authorities and the authorities of the government of Pakistan to meet their demands for a cockpit crew to fly the aircraft out of Pakistan, the conspirators executed a passenger, a United States national.

#### OVERT ACTS

12. On or about July 1986, in Damascus, Syria, JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, met with WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, also known as SLIMAN ALI EL-TURKI, also

known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, to provide them with instructions for carrying out the conspiracy.

13. On or about July 22, 1986, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, arrived in Pakistan.

14. On or about August 5, 1986, JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, arrived in Pakistan.

15. On or about August 8, 1986, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, arrived in Pakistan.



16. On or about August 5, 1986, continuing to on or about September 5, 1986, in Pakistan, defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, undertook preparations to hijack an aircraft operated by Pan American World Airways, an American corporation.

17. On or about September 5, 1986, at the airport in Karachi, Pakistan, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, armed with AK47 assault rifles, pistols, hand grenades and plastic explosives, boarded Pan American World Airways

flight 73 (United States registration number N656PA) and seized control of the aircraft.

18. On or about September 5, 1986, defendants JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, and MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, with force of weapons took physical control of two members of the aircraft's cabin crew.

19. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, demanded that a cockpit crew be provided to fly the aircraft to Larnaca, Cyprus, to secure the release of prisoners.

20. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, threatened that passengers would be killed one by one if the conspirators' demands were not met.

21. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, shot a passenger, Rajesh N. Kumar, a national of the United States, in the head and threw his body from the aircraft to the tarmac.

22. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, instructed a member of the aircraft's cabin

crew to collect the passengers' passports and to provide him with the passports of the American passengers.

23. On or about September 5, 1986, defendants ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, while on board Pan American flight number 73 (United States registration number N656PA), opened fire with their AK47 assault rifles and pistols and detonated their hand grenades, resulting in death and serious injury to passengers and crew, and damage and destruction to the aircraft.

(Violation of 18 U.S.C. § 371).

#### COUNT TWO

At all times relevant to this indictment:

1. Paragraphs 1 through 5 of Count One of this Indictment are realleged and expressly incorporated as if set forth in full herein.

#### THE CONSPIRACY

2. From on or about early July 1986 to on or about September 5, 1986, within the countries of Lebanon, Libya, Syria, Pakistan,

and elsewhere outside the United States, defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, together with others known and unknown to the Grand Jury, co-conspirators but not defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate and agree to unlawfully commit murder with premeditation and malice aforethought, in violation of 18 U.S.C. §§ 2331(a)(1).

MEANS AND METHODS USED BY THE CONSPIRATORS  
TO FURTHER THE OBJECT OF THE CONSPIRACY

3. Among the means used by the conspirators to further the object of the conspiracy were the following:

a. to ensure that United States nationals would be included among the crew and passengers, the conspirators agreed to hijack an aircraft operated by Pan American World Airways, an American corporation.

b. to effectuate the conspiracy, six of the conspirators undertook preparations in Pakistan to hijack an aircraft operated

by Pan American World Airways, an American corporation.

c. to effectuate the conspiracy, four of the conspirators armed themselves with various types of weapons and explosive devices and boarded Pan American World Airways flight 73 suddenly and without warning;

d. to ensure that the object of the conspiracy would be met, the conspirators armed themselves with belts made of plastic explosives and agreed to detonate such explosives while the crew and passengers were on board the aircraft.

#### OVERT ACTS

4. On or about July 1986, in Damascus, Syria, JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, met with WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, to provide them with instructions for the carrying out of the conspiracy.

5. On or about July 22, 1986, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, arrived in Pakistan.

6. On or about August 5, 1986, JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, arrived in Pakistan.

7. On or about August 8, 1986, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, arrived in Pakistan.

8. On or about September 5, 1986, at the airport in Karachi, Pakistan, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, armed with AK47 assault rifles, pistols, hand

grenades and plastic explosives, boarded Pan American World Airways flight 73 and seized control of the aircraft.

9. On or about September 5, 1986, defendants JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, and MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, with force of weapons assaulted and took physical control of two members of the aircraft's cabin crew.

10. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, demanded that a cockpit crew be provided to fly the aircraft to Larnaca, Cyprus, to secure the release of prisoners.

11. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, threatened to kill the passengers one by one if the conspirators' demands were not met.

12. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, shot a passenger, Rajesh N. Kumar, a national of the United States, in the head and threw his body from the aircraft to the tarmac.

13. On or about September 5, 1986, defendant ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, instructed a member of the aircraft's cabin

crew to collect the passengers' passports and to provide him with the passports of the American passengers.

14. On or about September 5, 1986, defendants ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, opened fire with their AK47 assault rifles and pistols and detonated their hand grenades, resulting in death and serious injury to passengers, including United States nationals.

(Violation of 18 U.S.C. §§ 2331(b)(2) and 2).

### COUNT THREE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as



ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully kill Rajesh N. Kumar, a national of the United States, by shooting him with a firearm.  
(Violation of 18 U.S.C. §§ 2331(a)(1) and 2).

COUNT FOUR

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully kill Surendra M. Patel, a national of the United States, by shooting him with a firearm.

(Violation of 18 U.S.C. §§ 2331(a)(1) and 2).

COUNT FIVE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the murder of Rajesh N. Kumar, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols. (Violation of 18 U.S.C. §§ 924(c) and 2).

COUNT SIX

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, ZAYD HASSAN ABD AL-LATIF

MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the murder of Surendra M. Patel, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

#### COUNT SEVEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID,

and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill John Harper, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

#### COUNT EIGHT

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of John Harper, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and

pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

COUNT NINE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Nadya Hussain, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known

as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of Nadya Hussain, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

#### COUNT ELEVEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA,

JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Deepak Mehra, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWELVE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR,

also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of Deepak Mehra, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

#### COUNT THIRTEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Jay Nagji Sureja, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).



COUNT FOURTEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of Jay Nagji Sureja, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

COUNT FIFTEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-

TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Ajay Patel, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

#### COUNT SIXTEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as

ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of Ajay Patel, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

#### COUNT SEVENTEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice

aforethought, did unlawfully attempt to kill David Gaiser, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

#### COUNT EIGHTEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of David Gaiser, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

COUNT NINETEEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Gargi Devi, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWENTY

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as

SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of Gargi Devi, for which they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

#### COUNT TWENTY-ONE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as

ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Rana Khan, a national of the United States, by discharging firearms and detonating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWENTY-TWO

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, during and in relation to a crime of violence, that is, the attempted murder of Rana Khan, for which

they could be prosecuted in a court of the United States, did knowingly use and carry a firearm, that is, AK47 assault rifles and pistols.

(Violation of 18 U.S.C. §§ 924(c) and 2).

COUNT TWENTY-THREE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Nabihal Hussain, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).



COUNT TWENTY-FOUR

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Hamled Hussain, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWENTY-FIVE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known

as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Farht Hussain, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

#### COUNT TWENTY-SIX

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID,

and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Shrikant Patel, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWENTY-SEVEN

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Raksha H. Shah, a national of the United States, by discharging firearms and

activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWENTY-EIGHT

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Saleem Ahmed, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT TWENTY-NINE

On or about September 5, 1986, within the country of Pakistan

and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill David L. Allison, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

#### COUNT THIRTY

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA,

JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill H. Shah Pratik, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT THIRTY-ONE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR,

also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Antusa R. Dasgupta, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT THIRTY-TWO

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Anisha Dasgupta, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT THIRTY-THREE

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as SALMAN ALI EL-TURKI, also known as SLIMAN ALI EL-TURKI, also known as BOU BAKER MUHAMMAD, ZAYD HASSAN ABD AL-LATIF MASUD SAFARINI, also known as MUSTAFA HASSAN SAID BOMER, also known as MUSTAFA, JAMAL SAEED ABDUL RAHIM, also known as FAHAD ALI AL-JASEEN, also known as FAHD ALI AL-JASSEM, also known as FAHAD, also known as ISMAEL, MUHAMMAD ABDULLAH KHALIL HUSSAIN AR-RAHAYYAL, also known as KHALIL ANTWAN KIWAN, also known as KHALIL, also known as WALID, and MUHAMMAD AHMED AL-MUNAWAR, also known as MANSOOR AL-RASHID, also known as MANSOUR ABDUL RAHMAN RASHED, also known as MANSOOR, also known as ASHRAF NAEEM, with premeditation and malice aforethought, did unlawfully attempt to kill Denali Dasgupta, a national of the United States, by discharging firearms and activating explosive devices.

(Violation of 18 U.S.C. §§ 2331(b)(1) and 2).

COUNT THIRTY-FOUR

On or about September 5, 1986, within the country of Pakistan and outside the United States, the defendants JOHN DOE, also known as AHMAD SOBHI, also known as TAYSEER, WADOUD MUHAMMAD HAFIZ AL-TURK, also known as WADOUD MUHAMMAD FAHD AL-TURK, also known as